

REMARKS

Favorable reconsideration of this application is respectfully requested.

Claims 1-24 are pending in this application. Claims 1-24 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. patent 5,959,536 to Chambers et al. (herein "Chambers") in view of "'In Home' Digital Networks and Cordless Options" to Eilley (herein "Eilley").

Addressing the above-noted rejection, that rejection is traversed by the present response.

Initially, applicants note each of the independent claims is amended by the present response to clarify a feature recited therein. Specifically, independent claim 1 clarifies that in the processing unit "said one communication node is recognized as part of the communication node on the second network by said another communication node on the second network while said one communication node is actually existing only on the first network". The other independent claims are similarly amended. The claim amendments are not believed to raise any issues of new matter.

One basis in the outstanding Office Action for maintaining the previous grounds for rejection states, in response to the previously filed amendments and comments:

In particular, applicant argues that *Chambers* does not teach the further limitation while said communication node is *actually operating on the first network* (see page 16 of applicant's remarks). The examiner respectfully disagrees. At issue is the term "operating". The Examiner notes the above term is still met by the *Chambers*' reference even though the abstract portion of the byte code is run on a class D device, see e.g., column 7, lines 8-55 in view of column 5, lines 23-52. In particular, the above limitation is met since at least the abstract device 202 has the responsibility of translating command messages it receives into actions on the *real device 108* it represents, see column 7, lines 17-20. As such, the above limitation is met. Specifically, *how* the one communication

node operates on the first network is not further recited in the claims. Hence the rejection is maintained.¹

In response to the above-noted basis for maintaining the rejection, applicants initially note the claims no longer recite the term “operating”, which was noted as being “at issue”. Instead, the claims now more positively and clearly recite the one communication node “actually existing only on the first network”. That amendment is believed to clarify that the one communication node is actually only on the first network and does not merely have an operation on the first network. Such claim amendments are believed to clarify the claims and address the above-noted basis for maintaining the outstanding rejection. Thereby, the claims as currently written are believed to clearly distinguish over the applied art.

The claim amendments clarify that a node on the second network can recognize one communication node as being on a second network while that one communication node is actually existing only on the first network. The claimed features are believed to clearly distinguish over the applied art.

In further detail, independent claim 1 recites that a communication node as a base station node recognizes one communication node on a first radio network as one of its own constituent elements (for example a Sub Unit) and discloses its own configuration information to another communication node on a second non-radio network (for example an IEEE 1394 bus), such that the another communication node on the second network (non-radio, for example the IEEE 1394 bus) recognizes the one communication node on the first network (radio network) as if it is a constituent element (for example a Sub Unit) of the claimed communication node on the second network (for example the IEEE 1394 bus) on the second network while said one communication node is actually existing only on the first network (radio network). In other words, the one communication node is not recognized as

¹ Office Action of February 21, 2006, prenumbered paragraph 3, pages 2-3 (original emphasis).

existing on the first network, although it is actually existing only on the first network, but instead is viewed as if it is a part of the communication node on the second network.

Similarly to independent claim 1 as noted above, independent claim 8 recites a communication node as a base station node that discloses first configuration information regarding constituent elements (for example Sub Units) in one communication node on a first radio network as its own constituent elements (for example the Sub Units), to another communication node on a second non-radio network (for example an IEEE 1394 bus), and/or discloses second configuration information regarding constituent elements (for example the Sub Units) in the other communication node on the second network (non-radio, for example the IEEE 1394 bus) as its own constituent element (for example the Sub Units), to the one communication node on the first network (radio network). In other words, the communication node of claim 8 provides configuration information disclosing a function similar to that of the communication node of claim 1, with respect to both communication nodes on both networks.

With respect to independent claim 16, independent claim 16 recites a communication node as a base station node that transfers data to be exchanged between a processing unit and an application executed on another communication node on a second non-radio network (for example an IEEE 1394 bus), through a first interface unit connected to a first radio network, such that the one communication node connected to the first network (the radio network) is handled as if it is connected to the second network (non-radio, for example the IEEE 1394 bus) on the second network while said one communication node is actually existing only on the first network. In other words, claim 16 recites a communication node that transfers data to the one communication node on the first network (radio network), on behalf of an application that is executed at another communication node on the second network (non-radio, for example the IEEE 1394 bus).

With respect to independent claim 19, independent claim 19 recites a communication network terminal, which is a radio terminal, that communicates with a communication node on a second non-radio network (for example an IEEE 1394 bus), discloses functions in the communication terminal as Sub Units in an AV/C protocol executed on an IEEE 1394 bus, and receives information regarding the Sub Units existing in that communication node on the second network (non-radio, for example the IEEE 1394 bus), while making a connection to a communication node on a first radio network. In other words, in claim 19 the communication terminal is connected to the first network (the radio network), but is also capable of communicating with a node on the second network (non-radio, for example the IEEE 1394 bus) through a communication node (e.g. a base station node), similarly as in claims 1 and 8, by disclosing its own functions as if they are Sub Units on the IEEE 1394 bus.

With respect to independent claim 22, independent claim 22 recites a communication terminal, which is a radio terminal, that communicates with a communication node on a second non-radio network (for example an IEEE 1394 bus) and executes an application on the second network (non-radio, for example the IEEE 1394 bus), while making a connection to a communication node on a first radio network. In other words, in claim 22 the communication terminal is actually connected to the first network (the radio network), but is also capable of communicating with a node on the second network (non-radio, for example the IEEE 1394 bus) through a communication node (e.g. a base station node), by executing an application on the second network (non-radio, for example the IEEE 1394 bus) at the communication terminal itself.

Each of the above-noted claims is believed to clearly distinguish over the teachings in Srivastava in view of Eilley.

In contrast to the claimed features noted above, Chambers discloses a control system in which, for example, a device abstraction (Abstract device) of a class C device is

downloaded to a class D device and executed on the class D device. That is, according to Chambers a part of a functionality of the class C device is transported into the class D device and operated on the class D device as a real part of the class D device.² In other words, in Chambers a class B device can recognize a device abstraction of a class C device as part of a class D device while the device abstraction is actually operating on the class D device, because the device abstraction is indeed a transported real part of the class D device.

Thereby, in Chambers the device abstraction of the class C device is actually downloaded to the class D device and thus become a transported real part of the class D device.

The present invention does not have such a structure or operation as in Chambers.

In the claimed invention a base station can voluntarily recognize one communication node on the first network as one of its constituent element, and can voluntarily disclose its own configuration information to another communication node on the second network such that the one communication node is recognized as a part of the claimed communication node on the second network by another communication node on the second network, but while the one communication node or terminal is *actually existing only on the first network*. That is, in the claimed invention there is no real transportation of a device abstraction from one class device to another class device such as in Chambers. Thus, the claimed features distinguish over the basis for the rejection citing Chambers.

Moreover, no teachings in Eilley are cited with respect to the above-noted features, nor any features in Eilley believed to cure the above-noted deficiencies of Chambers. Eilley is merely cited for and is merely directed to showing a radio network and a non-radio network, in general. Eilley is not cited with respect to the deficiencies of Chambers noted above, and is not believed to cure the above-noted deficiencies of Chambers.

² See for example Chambers at column 6, lines 35-38.

In view of these foregoing comments, the claims as currently written are believed to clearly distinguish over Chambers in view of Eilley.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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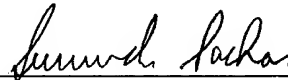
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